

FACEBOOK EXHIBIT U

**REDACTED VERSION OF DOCUMENT
SOUGHT TO BE FILED UNDER SEAL**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: FACEBOOK, INC. CONSUMER) MDL No. 2843

PRIVACY USER PROFILE LITIGATION) Case No. 1

) 18-md-02843-VC

This document relates to:)

ALL ACTIONS

_____)

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REMOTE VIDEOTAPED DEPOSITION BY VIRTUAL ZOOM OFF

FACEBOOK INC. REPRESENTATIVE,

KONSTANTINOS PAPAMILTIADIS

TUESDAY, FEBRUARY 23, 2021

Reported by:

Ashala Tylor, CSR #2436, CLR, CRR, RPR

JOB NO. 4473154

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1	BY MS. WEAVER:	10:32
2	Q. Okay. Who has it? You just gave that as	10:32
3	an example.	10:32
4	A. Yeah, but that is a logic that takes place	10:32
5	on the advertiser's side.	10:32
6	Q. Okay.	10:32
7	A. The advertiser selects the marketing team	10:32
8	on the advertiser side to decide what kind of	10:32
9	campaign they want to run. And they create a	10:33
10	segment of their customers that they want to target	10:33
11	with their ad campaign, and then they will decide	10:33
12	what creative they want to use, like how the ad is	10:33
13	going to look like.	10:33
14	Q. Right. But this is a list of information	10:33
15	that Facebook receives, right?	10:33
16	MS. STEIN: Objection to form.	10:33
17	THE WITNESS: The information we receive	10:33
18	is not the activities. It's hashed email addresses	10:33
19	or hashed phone numbers from the advertisers.	10:33
20	BY MS. WEAVER:	10:33
21	Q. Okay. Looking at this chart here, it's	10:33
22	labeled, "What kinds of information does Facebook	10:33
23	receive?" correct?	10:33
24	MS. STEIN: Objection to form.	10:33
25	(Background audio interference.)	10:33

1 [REDACTED] 10:34

2 MS. STEIN: Objection to form. The 10:35

3 document speaks for itself. 10:35

4 MS. WEAVER: I'm here to depose him about 10:35

5 the document, Deb. It was identified ahead of time. 10:35

6 Please answer the question. 10:35

7 MS. STEIN: Yeah, Lesley, this document is 10:35

8 all about targeted advertising, and you've been 10:35

9 going on for about an hour about targeted 10:35

10 advertising which isn't even in this case. It's 10:35

11 outside the scope of this case. 10:35

12 MS. WEAVER: You can instruct him not to 10:35

13 answer if you want, but I'm actually -- 10:35

14 MS. STEIN: Lesley, I've let this witness 10:35

15 testify for an hour about targeted advertising. So 10:35

16 if you want to ask him about the scope of this 10:35

17 deposition, you're free to, but suggesting that just 10:35

18 because you sent us a document about targeted 10:35

19 advertising -- 10:35

20 MS. WEAVER: Deb, stop lecturing and 10:35

21 wasting my minutes with the witness, please. 10:35

22 MS. STEIN: Lesley, I am stating my 10:35

23 position for the record. This is a 30(b)(6) 10:35

24 deposition on a specific set of topics. You've gone 10:35

25 beyond the scope. I've been very liberal in that. 10:35

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1 Q. What does that refer to? 10:37
2 A. So this is the version of the SDK that is 10:37
3 used by websites. 10:37
4 Q. Okay. And did that change over time? 10:37
5 A. Yes, we update the SDKs quite regularly. 10:38
6 Q. Okay. And "Mobile SDK," what is that? 10:38
7 A. This is the SDK that is used by native 10:38
8 apps, meaning iOS and Android. 10:38
9 Q. Okay. I just want to go back to 10:38
10 [REDACTED] 10:38
11 [REDACTED] 10:38
12 A. I think we discussed about that before. 10:38
13 So I'll try to repeat my previous response. 10:38
14 [REDACTED] 10:38
15 [REDACTED] 10:38
16 [REDACTED] 10:38
17 Q. Okay. I see that I guess the videographer 10:38
18 would like to take a quick break. So do you want to 10:38
19 just -- is that comfortable for you, K.P., to take a 10:38
20 break for a little bit here? 10:38
21 A. Yes, I need a coffee. 10:38
22 MS. WEAVER: Okay. So why don't we come 10:38
23 back at, do you want to say, 10:50? 10:38
24 THE WITNESS: 10 minutes from now? 10:38
25 MS. WEAVER: Yeah, does that work? Well, 10:39